

32D01-2203-CT-000035

Hendricks Superior Court 1

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Hendricks County, India

STATE OF INDIANA) IN THE HENDRICKS COURT
COUNTY OF HENDRICKS) SS:
AYOUD HASSAR) CAUSE NO.

VS.

GURSEWAK HANS and
SUNRISE FREIGHT SYSTEMS INC.

COMPLAINT FOR DAMAGES

Come now the Plaintiff, Ayoub Hassar, by counsel, Ken Nunn Law Office, and for their cause of action against the Defendants, Gursewak Hans and Sunrise Freight Systems Inc., alleges and states as follows:

STATEMENT AND JURISDICTION

1. This is a clear liability collision in which Defendants' 2016 Freightliner tractor and attached trailer, was negligently driven by Gursewak Hans causing a collision with the vehicle in which Plaintiff, Ayoub Hassar, was a passenger. As a result of the collision, Plaintiff has incurred medical expenses, lost wages, property damage and other special expenses in an amount to be proven at trial of this cause.

2. Jurisdiction and venue are appropriate in Hendricks County, Indiana, as said collision occurred within the boundaries of Hendricks County, State of Indiana.

FIRST CAUSE OF ACTION

NEGLIGENCE OF TRUCK DRIVER

3. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 2 above as if fully restated verbatim.

4. On or about July 9, 2020, Defendant Gursewak Hans negligently drove a tractor-trailer striking the vehicle in which Plaintiff, Ayoub Hassar, was a passenger.

5. Defendant Gursewak Hans had a duty to operate his tractor trailer in a safe and reasonable manner.

EXHIBIT

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6. Defendant Gursewak Hans failed in the above mentioned duties and is therefore negligent.

7. Defendant Gursewak Hans' negligence was the direct and proximate cause of Plaintiff's injuries.

8. Plaintiff Ayoub Hassar's injuries and damages are permanent.

9. As a direct and proximate result of Gursewak Hans' negligence, Ayoub Hassar has suffered lost wages.

10. Plaintiff, Ayoub Hassar, has incurred medical bills for the treatment of his injuries directly resulting from this collision.

11. As a direct and proximate result of Gursewak Hans' negligence, Ayoub Hassar has experienced physical and mental pain and suffering, lost wages and property damage and has lost the ability to perform usual activities, resulting in a diminished quality of life.

SECOND CAUSE OF ACTION

NEGLIGENCE PER SE OF TRUCK DRIVER

12. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 11 above as if fully restated verbatim.

13. Gursewak Hans violated state and federal statutes and regulations including but not limited to Title 9 of the Indiana Code.

14. Defendant Gursewak Hans' statutory violations directly and proximately caused Plaintiff's damages and injuries.

15. Defendant Gursewak Hans is negligent per se based on these statutory and regulatory violations.

THIRD CAUSE OF ACTION

RESPONDEAT SUPERIOR OF TRUCK COMPANY

16. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 15 above as if fully restated verbatim.

17. Defendant Gursewak Hans was the employee, agent, servant, or independent contractor for Sunrise Freight Systems Inc. Accordingly, Sunrise Freight Systems Inc. is vicariously liable for the acts of Defendant Gursewak Hans for the causes of action above.

WHEREFORE, the Plaintiff, Ayoub Hassar, by counsel, Ken Nunn Law Office, demand judgment against the Defendants, Gursewak Hans and Sunrise Freight Systems Inc. for permanent injuries in a reasonable amount to be determined at the trial of this cause, for medical expenses, lost wages, property damage and other special expenses, court costs and all other just and proper relief in the premises.

KEN NUNN LAW OFFICE

BY: s/ Bradford J. Smith

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REQUEST FOR TRIAL BY JURY

Comes now the plaintiff, by counsel, Ken Nunn Law Office, and requests that this matter be tried by jury pursuant to Trial Rule 38.

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